

3 Surrey Lane Hempstead, NY 11550 Tel: 516.483.2990 | Fax: 516.483.0566 Riccardo Iaccarino Wendell V. Shepherd

Matthew J. Berger*
Danielle M. Carney
Michele Harari
Dana L. Henke
Steven H. Kern
Lauren M. Kugielska*
Giacchino J. Russo
Julie Pearlman Schatz*

Roy Barnes, Retired

Wyckoff, NJ 07481 Tel: 914.592.1515 Fax: 914.592.3213

379 Sunset Blvd.

258 Saw Mill River Road

Elmsford, NY 10523 Tel: 914.592.1515 Fax: 914.592.3213

*Also Admitted in NJ

www.bislawfirm.com

February 2, 2023

VIA ECF Honorable Lorna G. Schofield, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re:

Trustees of the Drywall Tapers and Pointers Local Union No. 1974 Benefit

Funds, et al. v. L.G. Commercial Construction Corp.

Case No.:

22-cv-03155 (LGS)

Dear Judge Schofield,

This firm represents Plaintiffs Trustees of the Drywall Tapers and Pointers Local Union No. 1974 Benefit Funds (the "Funds") and the District Council No. 9, Drywall Tapers and Pointers of Greater New York Local Union 1974, Affiliated with International Union of Painters and Allied Trades, AFL-CIO (the "Union") (hereinafter collectively referred to as the "Plaintiffs") in the above referenced matter. On January 20, 2023, the court issued an Order [ECF No. 35], directing Plaintiffs to file default judgment materials, including a description of their communications with Defendant L.G. Commercial Construction Corp. throughout the history of this action, in accordance with the Court's Individual Rules, by no later than February 3, 2023. Plaintiffs are in the process of gathering records of their communications with Defendant. In light of these circumstances, Plaintiffs respectfully request an extension of the February 3rd deadline until February 10th.

Plaintiffs have not made any prior requests to adjourn the February 3rd deadline. Plaintiffs have been unable to connect with Defendant.

Honorable Lorna G. Schofield, U.S.D.J. February 2, 2023

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I appreciate your time and attention to this matter.

Respectfully submitted,

/s/ Lauren M. Kugielska Lauren M. Kugielska